# Swift & Staley Team/DOE Paducah Site Classification Office (CO)/Technical Information Office (TIO) and Operations Security (OPSEC) Release Form

To Be Completed by Person Requesting Release (Required to be completed prior to submittal to CO/TIO/OPSEC)

Date 2/4/09	Date Release is	Required											
Person Requesting Release Cand			Number 5	160									
Mailing Address	1												
Organization SST													
Document Number of Pages 22													
Accession Number (DMC only) # - 00005 - 139													
Document Title/Date Joint Policy Statement on Shared Site													
Author J. C. Holges Corporate Author													
									Media (Check all that apply)  Paper Photo Diskette Drawing Video CD Report/Letter Other  Project Subcontract/Task Order				
Requestor/Purpose of Release Pw	olic Release - 1	DOE											
p.					<u> </u>								
					,								
				•									
DO NOT WRITE P	ELOW THIS LINE - CO/TIO/	DC/OPSEC US	SE ONLY										
20													
Classified 🗌 Yes	No UCNI	☐ Yes	No										
ECI Yes	No ouo	☐ Yes	No										
Type of Release (Check One)	,												
☑ Public Release	☐ Internal Release Only		☐ Limited R	telease									
Reason (Check all that apply)	antomar torocco only												
☐ Circumvention of Statute	☐ Statutory Exemption	☐ Com	mercial/Propr	ietarv									
Personal Privacy	☐ Privileged Information	OPS	•	,010.1									
Other/Comments	[] I Maleged intoffication				÷								
Other/Comments													
	•		<b>ም</b> ስ	0.5,0	6								
DC Morene	man		Date FEB	ט יי ט	<u> </u>								
TIO MB		•	•	r r .	60								
TIO MBrens	eman		Date 🔠	05_0	_ ¥								
Reviewing Official*			Date										
				۸ ۴	- m								
OPSEC MBrener	non		Date FB	05	J_ U								
<del>()</del>	ining information in LICAL subje	oct area											
*Signature required for documents conta	ming information in OCM SUDJ	tu alta.											
CCTF 107 D 1													

2/5/08



### Department of Energy

Oak Ridge Operations Paducah Site Office P.O. Box 1410 Paducah, KY 42001

December 16, 1996

Distribution

Dear Associates:

#### Joint Policy Statement on Shared Site Issues

The attached document, USEC-100, Rev. 0, "Joint Policy Statement on USEC and DOE Direction and Management Expectations for Shared Site Issues," addresses current issues that require formal mechanisms for interface and control. This document conveys joint management expectations and directives from the Department of Energy (DOE) and the United States Enrichment Corporation (USEC) as outlined in the January 25, 1996 letter from G. P. Rifakes to Dr. Carl Paperiello of the Nuclear Regulatory Commission which enclosed the agreement from G. P. Rifakes and J. W. Parks, "USEC and DOE Resolution of Shared Site Issues at the Gaseous Diffusion Plants."

This joint policy statement applies to all USEC personnel, USEC prime contractors and their subcontractors, DOE personnel, DOE prime contractors and their subcontractors, and any DOE or USEC third-party tenants at the Paducah Site. It is expected that new or revised procedures will flow down from this policy statement.

Sincerely,

Jimmie C. Hodges DOE Site Manager

Steve A. Polston

USEC General Manager

JCH:SP:RRVeazey:ba

Attachment

Distribution Page 2 December 16, 1996

### Distribution

<u>DOE</u>

G. A. J. J. R. C. A. M. D. W. G. A. J. M. E.	Vilkes	J. Morris Brown M. A. Buckner J. R. Dew C. V. Hicks T. M. Hines L. L. Jackson F. J. Kocsis P. D. Lassiter D. C. Mason S. R. Penrod H. Pulley S. L. Shell W. E. Sykes J. H. Thomas S. A. Williams	J. J. Hill G. D. Puckett W. F. Redfield R. W. Seifert  USEC  J. A. Labarroc C. W. Martin  VORTEC  T. E. Herron N. W. Jetta	d
c:	A. M. Bosch D. L. Chumbler J. M. Collins O. W. Cypret S. L. Elkins R. L. Foster P. A. Gourieux D. R. Guminski	C. T. Hall D. A. Hill D. F. Hutcheson, Jr. T. B. Hudson S. M. Leone B. E. Lindsey D. M. Massey S. E. Meiners	L. D. Payne L. D. Rogers D. A. Schneider S. F. Seltzer R. E. Scott J. D. Sohl W. Stokes S. E. Tolar	R. R. Veazey D. S. Wattier R. L. Webb R. M. Wilkerson P. D. Wright S. S. Zimmerman PGDP LMES DMC-RC

**SMS** 

**LMUS** 



# PADUCAH GASEOUS DIFFUSION PLANT

JOINT POLICY STATEMENT ON USEC AND DOE DIRECTIVES AND MANAGEMENT EXPECTATIONS FOR SHARED SITE ISSUES

J. C. Hodges, DOE Site Manager S. A. Polston, USEC General Manager

December 1996

LOCKHEED MARTIN UTILITY SERVICES, INC. UNDER CONTRACT WITH THE UNITED STATES ENRICHMENT CORPORATION

#### **DISCLAIMER**

This report was prepared as an account of work sponsored by an agency of the United States Government. Neither the United States Government nor any agency thereof, nor any of their employees, makes any warranty, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product, or process disclosed, or represents that its use would not infringe privately owned rights. Reference herein to any specific commercial product, process, or service by trade name, trademark, manufacturer, or otherwise, does not necessarily constitute or imply its endorsement, recommendation, or favoring by the United States Government or any agency thereof. The views and opinions of authors expressed therein do not necessarily state or reflect those of the United States Government or any agency thereof.

DATE OF ISSUE: December 1996 DOCUMENT NUMBER: USEC-100

Rev. 0

# JOINT POLICY STATEMENT ON USEC AND DOE DIRECTIVES AND MANAGEMENT EXPECTATIONS FOR SHARED SITE ISSUES

J. C. Hodges, DOE Site Manager S. A. Polston, USEC General Manager

Prepared by
LOCKHEED MARTIN UTILITY SERVICES, INC.
Paducah Gaseous Diffusion Plant
P. O. Box 1410
Paducah, Kentucky 42002-1410
for the
UNITED STATES ENRICHMENT CORPORATION
Under Contract No. USEC-96-C-0001

# **CONTENTS**

		<u>Pag</u>	<u>ze</u>
1.0	PUR	OSE	1
2.0	APPLICABILITY 1		
3.0	0 REFERENCES 1		
4.0	INTE	DDUCTION	1
5.0	RESI	ONSIBILITIES	2
6.0	ACT	ONS	2
	6.1	SHARED SYSTEMS AND CONTINUITY OF ESSENTIAL SERVICES	2
		6.1.1 SSIA Agreement	
	6.2	CONTROL OF WORK ACTIVITIES	3
		6.2.1 SSIA Agreement	3 4
	6.3	PLANT CHANGES	4
		6.3.1 SSIA Agreement	4 4
	6.4	EMERGENCY MANAGEMENT COORDINATION	5
		6.4.1 SSIA Agreement	
	6.5	THIRD PARTY ACTIVITIES ON GDP SITES	6
		6.5.1 SSIA Agreement	

# **CONTENTS** (Continued)

		<u> </u>	age
	6.6	PHYSICAL PROTECTION COORDINATION	. 6
		6.6.1 SSIA Agreement	. 6 . 6
	6.7	EVENT NOTIFICATION	. 7
		6.7.1 SSIA Agreement	. 7 . 7
	6.8	HELIPAD	. 7
		6.8.1 PGDP Policy/Directives	. 7
	6.9	COMMUNICATION OF INCIDENT INFORMATION AND MEDIA COORDINATION	. 7
		6.9.1 SSIA Agreement	. 7 . 7
	6.10	RADIATION PROTECTION	. 8
		6.10.1 SSIA Agreement	
	6.11	PROCEDURE ISSUANCE	. 8
		6.11.1 Transition Element	. 8 . 9
	6.12	PERSONNEL ACCOUNTABILITY	. 9
		6.12.1 Transition Element	. 9 . 9
	6.13	OPERATIONAL SAFETY REQUIREMENT/TECHNICAL SAFETY REQUIREMENT TRANSITION	. 9
		6.13.1 Transition Element	. 9 10
7.0	UNRI	SOLVED ADMINISTRATIVE CONTROL ISSUES	10

#### LIST OF ACRONYMS

CAAS — Criticality Accident Alarm System

**DOE** — United States Department of Energy

JCO — Justification for Continued Operation

LMES — Lockheed Martin Energy Systems

LMUS — Lockheed Martin Utility Services

NRC — United States Nuclear Regulatory Commission

OSR — Operational Safety Requirement

PORC — Plant Operations Review Committee

PSS — Plant Shift Superintendent

SER — Safety Evaluation Report

SSIA — Shared Site Issue Agreement

TR — Technical Requirement

TSR — Technical Safety Requirement

USEC — United States Enrichment Corporation

USQ — Unreviewed Safety Question

USQD — Unreviewed Safety Question Determination

Blank Page

#### 1.0 PURPOSE

This joint USEC and DOE administrative policy statement addresses shared site issues at the Paducah Gaseous Diffusion Plant and the surrounding DOE-retained reservation as delineated in the January 25, 1996 letter from G. P. Rifakes to Dr. Carl Paperiello of NRC which enclosed the agreement from G. P. Rifakes and J. W. Parks, "USEC and DOE Resolution of Shared Site Issues at the Gaseous Diffusion Plants." This document also addresses other issues that require formal mechanisms for interface and control. This document conveys joint management expectations and directives from DOE and USEC.

#### 2.0 APPLICABILITY

This joint policy statement applies to all USEC personnel, USEC prime contractors and their subcontractors, and USEC third-party tenants (which may be referred to in this document as USEC and/or its agents); DOE personnel, DOE prime contractors and their subcontractors, and DOE third-party tenants (which may be referred to in this document as DOE and/or its agents). Since DOE has more than one prime contractor, policy statements or actions assigned may address all DOE prime contractors or may address actions to only one prime. USEC has one prime contractor, LMUS.

#### 3.0 REFERENCES

Letter from G. P. Rifakes to Dr. Carl Paperiello, Paducah Gaseous Diffusion Plant, Portsmouth Gaseous Diffusion Plant, Docket Nos. 70-7001 & 70-7002, Resolution of USEC/DOE Shared Site Issues, January 25, 1996

Application for United States NRC Certification — Paducah Gaseous Diffusion Plant Safety Analysis Report, Revision 4

Memo from J. W. Parks to G. P. Rifakes, Exhibit A, Lease Agreement Between DOE and USEC, November 8, 1994

#### 4.0 INTRODUCTION

USEC and DOE have determined jointly that a need exists to formally establish a policy that coordinates, integrates, and communicates site activities. Procedures shall flow down from this policy statement. All personnel must ensure:

USEC and DOE activities do not adversely affect the operations of the other party in terms of
health and safety, environmental protection, safeguards and security, and nuclear regulatory
compliance.

• Situations with the potential to affect both USEC and DOE operations and personnel, such as emergencies and threats directed toward site activities, are managed in a coordinated manner that protects the safety and health of DOE and USEC personnel, including their respective contractors, subcontractors and the public.

This document is co-sponsored by the DOE site manager and the USEC general manager.

This document shall define for each issue the appropriate policy for interface and integration between USEC and DOE or it shall direct respective organizations to implement by procedure issue or revisions action steps for interface and integration.

#### 5.0 RESPONSIBILITIES

Each manager and/or supervisor for DOE and USEC and their respective contractors, subcontractors, and third-party tenants is responsible to ensure their personnel are trained on this policy statement, training records are maintained, and training is updated to support later revisions.

The DOE site manager and USEC general manager are responsible for revising this policy statement as issues emerge that are deemed significant and appropriate as shared site issues.

#### 6.0 ACTIONS

For each shared site issue, the DOE and USEC agreements per the SSIA document are summarized below. The policy statement and/or directive to implement the agreement is then stated. Issues beginning with and subsequent to Section 7.11, Procedure Issuance, are elements not specifically discussed in the SSIA.

#### 6.1 SHARED SYSTEMS AND CONTINUITY OF ESSENTIAL SERVICES (Section 1 of the SSIA)

#### **6.1.1** SSIA Agreement

USEC provides certain services and utilities to DOE necessary for DOE activities/operations. USEC and DOE activities/operations are protected or supported by shared systems important to both their activities/operations.

USEC and DOE will work together to ensure interruptions to services are minimized and shared systems remain operable. USEC and DOE will work together to establish a process for controlling the scheduling of interruptions to essential services.

#### **6.1.2** PGDP Policy/Directives

Lease vs. Nonleased Facilities Identification. To ensure site personnel are aware of the status of leased and nonleased areas/facilities and future revisions are communicated, the building lease status drawings shall be issued as controlled documents. A formal mechanism shall be established as follows:

- either DOE, LMES, LMUS, or USEC propose changes
- input to commence the revision process is approval memo from G. Rifakes and J. Parks approving the proposed changes
- DOE/LMES will ensure the drawings are revised accordingly and obtain approval signatures from USEC and DOE site managers(or delegates)
- DOE/LMES shall provide a duplicate of the approved drawing to USEC/LMUS
- LMES shall issue through their design change procedure to all DOE personnel and/or its agents
- LMUS shall issue through their design change procedure to all USEC personnel and/or its agents

Shared Systems Identification. LMES and LMUS shall define those systems that are "shared" (i.e., both organizations are serviced by the same system(s) since the system(s) are essentially plantwide covering both leased and nonleased areas (i.e., fire detection and protection, CAAS system, lighting, etc.). Each organization shall proceduralize the list. LMES shall ensure the list incorporates any systems inputs made by the other DOE prime contractors.

Identification of the leased vs. nonleased facilities and shared systems is necessary in order to define the ownership definition of site areas and to identify those areas, facilities, processes, and systems that are shared.

Interface. USEC and/or its agents shall ensure DOE and/or its agents are aware of LMUS activities in planning or in process. Similarly, DOE and/or its agents shall ensure USEC and/or its agents are aware of DOE and/or its agent's activities in planning or process. This coordination will be accomplished each week through the exchange of planned work activities for that week. Any changes, additions, or deletions during the week will be communicated through meetings or teleconferences.

Both LMUS and LMES shall appoint coordinators responsible for this timely and accurate communication. LMES shall ensure other DOE prime contractors and DOE third-party tenants schedules are incorporated also.

#### 6.2 CONTROL OF WORK ACTIVITIES (Section 2 of the SSIA)

#### 6.2.1 SSIA Agreement

USEC and DOE agree activities in leased spaces must be conducted according to USEC commitments to the NRC. Accordingly, DOE (including their prime contractors and respective subcontractors), will obtain USEC's approval before conducting work in leased spaces.

USEC (including their prime contractor/subcontractors) will also obtain DOE's approval before conducting work in nonleased spaces.

#### **6.2.2** PGDP Policy/Directives

See Section 6.3.

#### 6.3 PLANT CHANGES (Section 3 of the SSIA)

#### **6.3.1** SSIA Agreement

DOE and USEC agree to establish procedural controls to govern the notification and approval process.

USEC will provide DOE with a copy of each approved Safety Analysis issued according to 10 CFR 76.68 with respect to any changes to the leased premises or operation of the leased premises. DOE will provide USEC with a copy of each USQD or Safety Analysis prepared with respect to any changes to the DOE retained facilities, systems, or operations. DOE and USEC will provide each other with a copy of each USQ and pertinent information, including any JCO or similar document prepared in connection with the USQ.

In the event either party has a concern about the potential impact of any plant changes by the other party on the safety of its own operations and activities, the appropriate USEC and DOE representatives shall jointly review the change and take appropriate actions to resolve the concern (including any required plant modifications) in a prompt manner.

#### **6.3.2** PGDP Policy/Directives

The following policy shall apply to PGDP. LMUS and DOE's prime contractors are directed to issue procedures to capture and require compliance with these policies.

USEC and/or its agents and DOE and/or its agents shall notify each other so that each is aware of the other's activity purpose, scope, description, location, any possible accident scenarios and resultant emergency responses, and possible impacts on DOE and USEC operations.

- 1. Activities conducted by USEC/LMUS within facilities leased to USEC and activities conducted by USEC/LMUS within the perimeter fence, excluding areas retained by DOE and access and egress thereto, shall be conducted per USEC requirements.
- 2. LMUS shall obtain DOE's approval before conducting work within areas retained by DOE, unless the activity is in response to an emergency situation (security event, fire, radiological, etc.). LMES will serve as DOE's representative for DOE and/or its agents.
- 3. Activities conducted by DOE and/or its agents within areas retained by DOE or within facilities or areas leased to USEC shall be conducted per the following rules.
  - DOE and/or its agents will obtain USEC/LMUS's approval before conducting DOE work in leased facilities or areas.

The work will be performed to USEC/LMUS requirements.

 DOE will obtain USEC/LMUS's approval before conducting DOE work in DOE retained areas if the area is located in a leased facility and if access/egress corridors through the leased facility are required to move DOE material or equipment through these corridors.

The DOE work will be performed to DOE requirements.

• DOE will notify USEC/LMUS of DOE work in DOE retained facilities or areas, DOE retained areas within leased facilities, and in common areas.

The DOE work will be performed to DOE requirements.

- 4. DOE and/or its agents shall obtain LMUS' approval or provide notification to LMUS under 6.3.2.3. LMES and LMUS will appoint single point contacts to facilitate communication. LMUS will advise LMES, through this process, if activity should be presented to PORC or the PSS. LMES will serve as representative for DOE and/or its agents.
- 5. DOE and/or its agents and USEC and/or its agents shall exchange safety analyses, safety evaluations, and USQDs per the SSIA agreement. If approval is required under 6.3.2.2 or 6.3.2.3, these shall be provided prior to start of the activity.
- 6. Each work activity shall have a Shared Site Activity Screening form, Appendix A, prepared per the guidelines of Appendix A.

Resolution of concerns, disagreements, or conflicts between DOE/LMES and USEC/LMUS or between their contractors/subcontractors will be resolved through the normal working process. If resolution cannot be reached, the appropriate level of management for each party shall meet jointly with the respective parties to effect resolution. In those rare cases where resolution still is not effected, the concerned employees and their management shall meet jointly with the Site Council for resolution.

#### 6.4 EMERGENCY MANAGEMENT COORDINATION (Section 4 of the SSIA)

#### 6.4.1 SSIA Agreement

USEC has the lead role in responding to a declared emergency with DOE serving as an on-site member of the Emergency Operations Center. In coordination with the USEC management team, DOE will take appropriate actions to control activities in the reservation area surrounding the site, including evacuation of personnel from these areas.

In accordance with Exhibit F of the lease, USEC will provide emergency response training to DOE personnel, DOE contractors, subcontractors, and personnel of DOE's third-party tenants. DOE will assure these personnel attend both the initial training and periodic update training.

#### **6.4.2** PGDP Policy/Directives

LMUS and LMES shall issue/revise the appropriate procedures to address the agreements stated in the first paragraph under 6.4.1. At DOE and/or its agent's request, LMUS will provide training to DOE and/or its agent's personnel.

#### 6.5 THIRD PARTY ACTIVITIES ON GDP SITES (Section 5 of the SSIA)

#### 6.5.1 SSIA Agreement

DOE and USEC agree to promptly provide each other with pertinent information concerning any operations or activities being conducted on their respective portions of the site and the surrounding DOE-owned reservation, by or on behalf of third parties.

DOE and USEC will promptly provide each other with a written description of each third-party lease agreement including:

- Detailed description of the activity including purpose, scope, description, location, manpower, schedule, and safety analysis
- Any hazardous materials to be used or stored in connection with the lease, and
- Any transportation or other access requirements on the leased premises, particularly with respect to transportation or storage of hazardous materials or equipment
- Any operations or activities that could pose a hazard to the other party's operations or activities or act as an initiating event. Include description of any equipment to be brought on-site in conjunction with the lease activity.
- In the event either party has a concern about the potential impact third-party activities could have on the safe operation of the site, the appropriate USEC and DOE representatives shall jointly review the issue and take appropriate action to resolve the concern in a prompt and cost-effective manner.

Such descriptions shall be updated promptly to reflect changes in third-party activities.

#### 6.5.2 PGDP Policy/Directives

Both LMES and LMUS shall issue/revise the appropriate procedures to address this agreement. LMES shall ensure USEC is provided the required information for each DOE third-party tenant.

#### 6.6 PHYSICAL PROTECTION COORDINATION (Section 6 of the SSIA)

#### 6.6.1 SSIA Agreement

DOE and USEC have agreed USEC will continue to maintain the physical security plan, defining roles and responsibilities for the security organization, and USEC's security force has responsibility for initial response to a threat and to determine the appropriate course of action.

#### 6.6.2 Policy/Directives

No further actions are required for this issue.

#### 6.7 EVENT NOTIFICATION (Section 7 of the SSIA)

#### 6.7.1 SSIA Agreement

USEC, normally through the PSS, will promptly notify DOE of any reportable events required by 10 CFR 76 or other applicable NRC regulations.

DOE will similarly notify the PSS of any reportable events, as categorized per DOE's occurrence reporting process, for which DOE is responsible.

#### **6.7.2** PGDP Policy/Directives

Both LMES and LMUS shall issue/revise the appropriate procedures to address these agreements.

#### **6.8 HELIPAD (Section 8 of the SSIA)**

#### **6.8.1** PGDP Policy/Directives

DOE and USEC have agreed the Helipad at PGDP does not exist. Therefore, no actions are required for this issue.

# 6.9 COMMUNICATION OF INCIDENT INFORMATION AND MEDIA COORDINATION (Section 9 of the SSIA)

#### **6.9.1** SSIA Agreement

For information releases to the media during and subsequent to an event, USEC has the lead role in providing news releases to the media relating to USEC activities whereas DOE has the lead role in providing information releases relating to DOE events. Each organization will refer the media to the appropriate organization having the lead role unless a need exists for DOE to provide information in its role as landlord.

DOE and USEC will promptly provide each other with information copies of news releases of events.

#### **6.9.2** PGDP Policy/Directives

LMUS and LMES shall issue/revise the appropriate procedures to address these agreements.

#### 6.10 RADIATION PROTECTION (Section 10 of the SSIA)

#### 6.10.1 SSIA Agreement

Radiation protection (exposure monitoring) is the responsibility of the employer (USEC and DOE) for their respective personnel, contractors, subcontractors, and third-party tenants and is independent of the activities upon which they are working. In accordance with Appendix F of the lease, USEC will provide radiation protection training to DOE personnel, contractors, subcontractors, and personnel of third-party tenants of DOE. Radiation exposure information for individuals who work on both DOE and USEC activities will be shared in order to satisfy exposure reporting requirements. DOE is responsible for ensuring DOE personnel, DOE contractors, subcontractors, and third-party tenants of DOE attend the required initial and periodic training updates.

#### 6.10.2 PGDP Policy/Directives

LMUS is responsible for implementing procedures to address those responsibilities for USEC listed above plus:

- Providing notification to DOE and DOE's contractors, subcontractors, and third-party tenants of periodic training and updates required to maintain training current and
- Defining the differences in posting, classification, etc. that exist between the respective DOE/USEC programs and assuring these differences are detailed in the respective training programs.

At DOE and/or its agent's request, LMUS will provide training to DOE and/or its agent's personnel. LMES is responsible for implementing procedures to address those responsibilities listed above for DOE plus:

 Defining the differences in posting, classification, etc. that exist between the respective DOE/USEC programs.

If personnel of either DOE and/or its agents or USEC and/or its agents discovers an area or activity (whether temporary or permanent) that should be posted and is not, the personnel will post immediately and notify the PSS who will make the appropriate notifications.

#### 6.11 PROCEDURE ISSUANCE

#### **6.11.1** Transition Element

Procedures are being issued or revised by site organizations without a coordinated review for concurrence by other site organizations which are/were impacted by the procedure's new contents.

#### **6.11.2** Policy/Directives

Procedures being issued or revised by either DOE's or USEC's respective prime contractors/subcontractors or their respective third-party tenants shall be coordinated with the other affected site organization for review and concurrence before issue. The time allotted by the issuing organization for review shall be adequate and with advance notification. In cases requiring extremely short processing time, the issuing organization will make notification to the other party of the need for expeditious issue. The reviewing organization will either work in conjunction with the preparing organization during the preparation stage or wave its review rights depending on the subject of the procedure and scope of change (i.e., revision could in no manner impact the reviewing organization).

Procedures being revised or issued to implement the Shared Site Resolution shall be so denoted in the procedure.

This directive shall be proceduralized by DOE's and USEC's prime contractors. All procedures are included until DOE and USEC agree mutually in writing on a specific procedure list for cross-review and concurrence. LMUS and LMES shall establish coordinators who will be the main interface points between the two organizations. LMES shall serve as coordinator for DOE and/or its agents. LMUS shall serve as coordinator for USEC and/or its agents.

#### 6.12 PERSONNEL ACCOUNTABILITY

#### **6.12.1 Transition Element**

The site must ensure all site personnel are accounted for on a daily basis and, especially, in the event of an emergency is declared.

#### **6.12.2 PGDP Policy/Directives**

Both USEC and/or its agents and DOE and/or its agents shall ensure accountability for their respective employees, prime contractors and their subcontractors, and third-party tenants on a daily basis. No further documents are needed to implement this policy.

# 6.13 OPERATIONAL SAFETY REQUIREMENT/TECHNICAL SAFETY REQUIREMENT TRANSITION

#### **6.13.1 Transition Element**

USEC/LMUS is converting existing OSRs into TSRs to support the NRC certification process. The existing OSRs are superseded by TSRs once issued.

#### 6.13.2 PGDP Policy/Directives

The following interfaces and/or programs shall be proceduralized by both LMES and LMUS:

- LMUS shall provide the TSR (with attached TR), SER, and superceded OSR to LMES for review.
- LMES shall review and identify those TSRs with a potential for impacting DOE and/or its agent's activities and, for any identified, coordinate resolution with LMUS through the DOE site manager or his designee.
- LMES shall identify any OSRs needed to operate the DOE areas of responsibility during and after the transition to NRC oversight of USEC. LMES will coordinate those OSRs identified with LMUS for potential impact on USEC's areas of responsibility.
- LMUS and LMES shall ensure that revised TSRs are coordinated with each other.

Both LMES and LMUS shall issue/revise procedures to address these agreements. LMES shall also address procedurally the mechanisms that allow their TSRs or OSRs to be implemented and any coordination required with the PSS.

LMES shall develop a DOE/LMES specific systems list for safety-related, important to safety, and nonsafety systems, structures, and components that covers DOE's areas of responsibility. This list will be coordinated with LMUS for review. LMUS shall coordinate their USEC/LMUS specific systems list with LMES.

#### 7.0 UNRESOLVED ADMINISTRATIVE CONTROL ISSUES

The issues listed in this section shall be addressed by future revisions to this document upon their resolution.

Safety Analysis Report Ownership and Maintenance Configuration Management Ownership and Maintenance DOE-Owned Privacy Records Storage, Control, and Access International Atomic Energy Agency Safeguards Agreement Unclassified Controlled Nuclear Information Common Area Definition, Ownership, and Interface Requirements DOE Stored Nuclear Material in Process Buildings Quality Assurance Plan Interface Requirements Problem Reporting System Interface Requirements Commitment Tracking/Corrective Action Interface Requirements **Dual Standards Exception Requests** Scheduling of Joint Activities for Emergency Management USOD Program Endorsement and Requirements NRC Liaison Requirements Records Retention and Shared Reports **Document Control Interface Requirements** 

#### SHARED SITE ACTIVITY SCREENING INSTRUCTIONS

The form on the next page shall be completed for each work activity to be performed by either USEC and/or its agents or DOE and/or its agents unless the appropriate level of management with responsibility for the work activity decides a Shared Site Activity Screening is not required due to the insignificance of the task.

The screening form is mandatory for any activity:

- that will interface with or pass through a DOE/USEC boundary
- that impacts a important to safety or safety-related system
- that requires a safety evaluation
- that requires a decision as to regulatory oversight authority (i.e., NRC vs. DOE)

The preparer (#14) shall be the individual within the respective organization that owns the work activity (e.g., if LMES is contracting LMUS to perform a DOE owned activity, the cognizant LMES personnel shall complete this form even though LMUS personnel may complete the remainder of the work activity's forms). The manager (#15) is the appropriate level of management within the preparer's organization. These levels should be defined within each organization.

Approval/Notification (#16) shall be used to document approval or acknowledgment of notification by the other shared site organization (i.e, LMUS owns the work in a DOE retained area and LMES will sign #16 for approval of the work activity in the DOE area).

This form is intended to facilitate communication and concurrence, when needed, under the umbrella of the Shared Site concept. It is not intended nor is it to replace procedures and evaluations/analyses which are normal to the site's procedural flow of work.

This form shall be part of the documentation package assembled for the work activity and shall be filed accordingly.

### SHARED SITE ACTIVITY SCREENING

Work Package ID (if any):	Brief Description:		
2. Location of Work:			
3. System ID:			
4. Is this area leased or non-leased: ☐ L ☐ NL			
5. Is this system: ☐ SHARED ☐ USEC's ☐ DOE's			
6. Is the work owned by: ☐ USEC ☐ DOE			
7. If work is owned by USEC:			
A. If work is non leased, has DOE approved ☐ YES ☐ NO ☐ NA			
B. Does DOE have copy of: ☐ SA ☐ USQD	B. Does DOE have copy of: ☐ SA ☐ USQD ☐ USQ ☐ NA		
C. Who will perform regulatory oversight: ☐ NRC ☐ DOE  D. Is work to be performed in a SWMU?			
E. If yes, has contact with DOE/LMES for EPA notification be	E. If yes, has contact with DOE/LMES for EPA notification been made? ☐ YES ☐ NO		
8. If work is owned by DOE:			
A. If work area is in leased facility, has USEC approved: $\ \Box$	YES □ NO		
B. If work area is DOE retained within a leased facility, and acess/egress corridors are required, has USEC approved   YES  NO			
and have access/egress routes been defined/agreed to: ☐ YES ☐ NO			
C. If work area is DOE retained, has USEC been notified: ☐ YES ☐ NO			
D. Was approval/notification by/with: ☐ PORC ☐ PSS			
E. Who will perform regulatory oversight: ☐ NRC ☐ DOE			
F. Does USEC have copy of: □ SA □ USQD □ USQ □ NA			
9. Are hazardous materials/equipment: ☐ USED ☐ STORED ☐ TRANSPORTED ☐ NA			
10. Could activity pose hazards to the site: ☐ YES ☐ NO			
11. Could activity act as initiating event for and accident:   YE	S □ NO		
12. Have emergency response plans been defined (if needed):	☐ YES ☐ NO ☐ NA		
13. Have compensatory measures been defined (if needed):	☐ YES ☐ NO ☐ NA		
14. Preparer:	16. Manager:		
15. Approval/Notification			

# DISTRIBUTION

Library - RC (2) LMES DMC